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October 17, 2024

**VIA ECF**

Magistrate Judge Daniel J. Stewart  
United States District Court  
Northern District of New York  
445 Broadway  
Albany, New York 12207-2936

**Re: *William Kelley v. Mohawk Fine Papers Inc., Fedrigoni Special Papers North America, Inc., Edward Knott, John Goman Brenda Stokes, and Amy Whitney*; Civil Case No.: 1:24-CV-01264 (AMN) (DJS)**

Dear Judge Stewart,

We represent Defendants Fedrigoni Special Papers North America, Inc. (“Fedrigoni”), Edward Knott, John Goman, Brenda Stokes, and Amy Whitney (collectively, the “Individual Defendants”) in the above-referenced matter. Please accept this letter with the attached Stipulation as the Defendants’ request to extend the time to Answer or otherwise respond to the Amended Complaint through and including November 13, 2024. Currently, the date for the Defendants to respond is October 22, 2024. This is the Defendants’ first request for an extension of time to file an Answer or otherwise respond. Aside from the date for the Defendants to respond, this request will not affect any other court scheduled deadlines. We have conferred with Plaintiff’s counsel and he consents to the requested extension of time, as evidenced by the attached Stipulation. We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Caitlin Breen".

Caitlin Breen

cc: Christopher Berlingieri, Esq. – via ECF  
Brad J. Axelrod, Esq. – via electronic mail

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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WILLIAM KELLEY,

**Case No.: 24-CV-01264(AMN)(DJS)**

Plaintiff,

**STIPULATION**

– against –

MOHAWK FINE PAPERS INC., FEDRIGONI  
SPECIAL PAPERS NORTH AMERICA, INC.,  
EDWARD KNOTT, JOHN GOMAN, BRENDA  
STOKES, and AMY WHITNEY, in their professional  
and individual capacities,

Defendants.

-----X

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel of record for the respective parties herein, that the time for Defendants Mohawk Fine Papers Inc., Fedrigoni Special Papers North America, Inc., Edward Knott, John Goman, Brenda Stokes, and Amy Whitney (collectively the “Defendants”) to answer or otherwise respond to the Amended Complaint is extended up to and including November 13, 2024.

IT IS FURTHER STIPULATED AND AGREED that this stipulation may be signed in counterparts and by facsimile signature, which shall be deemed an original for all purposes.

\*\*\* SIGNATURE PAGE TO FOLLOW \*\*\*

Dated: New York, New York  
October 17, 2024

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